

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
POWER COMPANY FOR (1) A GENERAL)
ADJUSTMENT OF ITS RATES FOR ELECTRIC)
SERVICE; (2) APPROVAL OF TARIFFS AND)
RIDERS; (3) APPROVAL OF ACCOUNTING) CASE NO.
PRACTICES TO ESTABLISH REGULATORY) 2020-00174
ASSETS AND LIABILITIES; (4) APPROVAL OF)
A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY; AND (5) ALL OTHER)
REQUIRED APPROVALS AND RELIEF)

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
RESPONSE TO COMMISSION STAFF’S SECOND
REQUEST FOR INFORMATION**

Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and submits its response to Kentucky Public Service Commission Staff’s Second Request for Information.

Respectfully submitted,

/s/David E. Spenard
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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 1st day of April 2021, and further certifies that the electronic version of the paper is a true and accurate copy of each paper filed in paper medium. Pursuant to the Commission's March 16, 2020, and March 24, 2020, Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, will be filed at the Commission's offices within 30 days of the lifting of the state of emergency.

/s/ David E. Spenard
David E. Spenard

NOTICE REGARDING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David. E. Spenard
David E. Spenard

Kentucky Solar Industries Association, Inc.
KY PSC Case No. 2020-00174
Response to Commission Staff's Second Request for Information

Witnesses Responsible:

Benjamin D. Inskeep

Request No. 1

Refer to the Direct Testimony of Benjamin D. Inskeep, pages 20–21, Table 2, Comparison of Attributes of Modified Net Metering Policies in Selected States. For each state with a legacy rights term, explain what is covered by the legacy rights and Case No. 2020-00174 indicate whether the legacy rights term is required by law or whether it was imposed by the applicable regulatory agency.

Response:

See Attachment 2021.04.01 kyseia BDI-PSC-IR-1

Please note that the “Legacy Rights Term” information on Table 2 at page 21 [PDF 21 of 31] of Witness Inskeep Supplemental Testimony for Additional Proceedings (filed February 25, 2021) contains an error for Texas (EPE). The error is corrected in the attachment to this response.